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VIA FCC ELECTRONIC COMMENT FILING SYSTEM

September 20, 2007

Ex Parte Presentation

Ms. Marlene Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Petitions of the Frontier and Citizens ILECs, the Embarq Local Operating Companies, AT&T Inc. and BellSouth Corporation for Forbearance from Title II and Computer Inquiry Rules with Respect to their Broadband Services, WC Docket Nos. 06-125 and 06-147

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. §1.1206, Citizens Communications Company and its Frontier Communications subsidiaries provide notice of ex parte communications that were e-mailed on September 19, 2007. The communications were letters from Kenneth Mason – Director, Government & External Affairs to each of the commissioners. Copies of the letters are attached hereto and filed herewith.

Respectfully submitted,

Gregg C. Sayre
Associate General Counsel -
Eastern Region

GCS/hmj
Attachments (5)



COMMUNICATIONS SOLUTIONS

180 S. Clinton Ave., 5th Floor, Rochester, NY 14646

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ken.mason@frontiercorp.com

BY ELECTRONIC MAIL

September 19, 2007

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street SW, 8th Floor
Washington, DC 20554

**Re: WC Docket No. 06-147; Frontier Communications Petition for Forbearance
from Title II and Computer Inquiry Requirements for Broadband Services**

Dear Chairman Martin:

Frontier Communications would like to clarify its letter to you of September 11, 2007, in which Frontier responded to a question from Chris Moore, Commissioner Tate's Legal Advisor. Mr. Moore asked Frontier to clarify the intent of its request to the FCC for forbearance with respect to interstate interexchange or interstate access services in the above-referenced Petition for Forbearance.

It is Frontier's position that the grant of interexchange-only forbearance would not provide meaningful or substantial relief from the strictures of regulation that prevent Frontier from competing on a level playing field with larger, well-financed and essentially unregulated intermodal competitors. Frontier submits that the record fully warrants granting Frontier forbearance for the broadband services included in our petition at least as broad as that granted to ACS of Anchorage one month ago,¹ without regard to whether the services are considered to be interexchange or exchange access services, and without regard to whether the services are provided to commercial end users or to carriers.

Very truly yours,

Kenneth Mason
Director – Government &
External Affairs

¹ *Petition of ACS of Anchorage for Forbearance*, WC Docket No. 06-109, Memorandum Opinion and Order, ___ FCC Rcd ___, FCC 07-149 (Aug. 20, 2007).



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September 19, 2007

Commissioner Jonathan S. Adelstein
Federal Communications Commission
445 12th Street SW, 8th Floor
Washington, DC 20554

**Re: WC Docket No. 06-147; Frontier Communications Petition for Forbearance
from Title II and Computer Inquiry Requirements for Broadband Services**

Dear Commissioner Adelstein:

Frontier Communications would like to clarify its letter to you of September 11, 2007, in which Frontier responded to a question from Chris Moore, Commissioner Tate's Legal Advisor. Mr. Moore asked Frontier to clarify the intent of its request to the FCC for forbearance with respect to interstate interexchange or interstate access services in the above-referenced Petition for Forbearance.

It is Frontier's position that the grant of interexchange-only forbearance would not provide meaningful or substantial relief from the strictures of regulation that prevent Frontier from competing on a level playing field with larger, well-financed and essentially unregulated intermodal competitors. Frontier submits that the record fully warrants granting Frontier forbearance for the broadband services included in our petition at least as broad as that granted to ACS of Anchorage one month ago,¹ without regard to whether the services are considered to be interexchange or exchange access services, and without regard to whether the services are provided to commercial end users or to carriers.

Very truly yours,

Kenneth Mason
Director – Government &
External Affairs

¹ *Petition of ACS of Anchorage for Forbearance*, WC Docket No. 06-109, Memorandum Opinion and Order, ____ FCC Rcd ____, FCC 07-149 (Aug. 20, 2007).



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September 19, 2007

Commissioner Michael J. Copps
Federal Communications Commission
445 12th Street SW, 8th Floor
Washington, DC 20554

**Re: WC Docket No. 06-147; Frontier Communications Petition for Forbearance
from Title II and Computer Inquiry Requirements for Broadband Services**

Dear Commissioner Copps:

Frontier Communications would like to clarify its letter to you of September 11, 2007, in which Frontier responded to a question from Chris Moore, Commissioner Tate's Legal Advisor. Mr. Moore asked Frontier to clarify the intent of its request to the FCC for forbearance with respect to interstate interexchange or interstate access services in the above-referenced Petition for Forbearance.

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Very truly yours,

Kenneth Mason
Director – Government &
External Affairs

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September 19, 2007

Commissioner Robert M. McDowell
Federal Communications Commission
445 12th Street SW, 8th Floor
Washington, DC 20554

**Re: WC Docket No. 06-147; Frontier Communications Petition for Forbearance
from Title II and Computer Inquiry Requirements for Broadband Services**

Dear Commissioner McDowell:

Frontier Communications would like to clarify its letter to you of September 11, 2007, in which Frontier responded to a question from Chris Moore, Commissioner Tate's Legal Advisor. Mr. Moore asked Frontier to clarify the intent of its request to the FCC for forbearance with respect to interstate interexchange or interstate access services in the above-referenced Petition for Forbearance.

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Very truly yours,

Kenneth Mason
Director – Government &
External Affairs

¹ *Petition of ACS of Anchorage for Forbearance*, WC Docket No. 06-109, Memorandum Opinion and Order, __ FCC Rcd __, FCC 07-149 (Aug. 20, 2007).



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BY ELECTRONIC MAIL

September 19, 2007

Commissioner Deborah Taylor Tate
Federal Communications Commission
445 12th Street SW, 8th Floor
Washington, DC 20554

**Re: WC Docket No. 06-147; Frontier Communications Petition for Forbearance
from Title II and Computer Inquiry Requirements for Broadband Services**

Dear Commissioner Tate:

Frontier Communications would like to clarify its letter to you of September 11, 2007, in which Frontier responded to a question from Chris Moore, your Legal Advisor. Mr. Moore asked Frontier to clarify the intent of its request to the FCC for forbearance with respect to interstate interexchange or interstate access services in the above-referenced Petition for Forbearance.

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Very truly yours,

Kenneth Mason
Director – Government &
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